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September 17, 2003

SEP 20 2003

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C St. SW  
Washington, DC 20204

Pharmavite Reference: 9605 P20AC

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:  
Pharmavite LLC, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):  
Total Effects is a special combination of vitamins and minerals, all in one daily pack, to help fight seven signs of aging.  
  
Alpha Lipoic Acid helps enhance antioxidant performance to help prevent skin puffiness.  
  
A unique multivitamin helps support collagen and maintains good health and well-being.
- (3) Name of the dietary ingredient(s) if not provided in the text of the statement:  
Each packet of Total Effects contain:  
Multivitamins  
Coenzyme Q-10  
Vitamin E (as dl-Alpha Tocopheryl Acetate)  
Alpha Lipoic Acid
- (4) Name of the dietary supplement:  
Total Effects Beautiful Skin & Wellness or products containing the above ingredients

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Re: 9605 P20AC  
September 17, 2003

SEP 20 2003

Page 2

The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, Kirkland Signature, Nature Made, Nature's Resource, Nutri - Plus, Olay, Spring Valley, Target, TruNature, Walgreens.

We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

David Kropp  
Director, Regulatory and Consumer Affairs

cc. P. Bolar